ORIGINAL

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Dee May
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EX PARTE OR LATE FILED

Bell Atlantic

November 2, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 99-295: In the Matter of Application of Bell Atlantic Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in New York

Dear Ms. Salas,

At the request of the Common Carrier Bureau Policy Division, Bell Atlantic met with representatives of the CCB yesterday to address their questions regarding Interconnection and related information that was filed in our New York Long Distance Application. Representing Bell Atlantic were Michael Glover, Julie Canny, Don Albert and me. Representing the Policy Division was Daniel Shiman, Andrea Kearney, Claudia Pabo and Eric Einhorn. Representing Accounting were Tony Dale, Whitey Thayer, and Peter Young. Materials used at the meeting are attached.

As outlined in the Public Notice (DA-99-2014) issued by the FCC on September 29, 1999, the 20 page ex parte limit does not apply to this ex parte since Bell Atlantic is responding to direct questions raised by Commission staff and reviewed material addressed in our original application. The page limitation also does not apply to the material attached because it was used during the ex parte meeting to facilitate discussion.

Please feel free to contact me with any questions.

Sincerely,

Dee May

Attachment

cc: A. Dale
A. Kearney
C. Pabo
D. Shiman
W. Thayer
P. Young

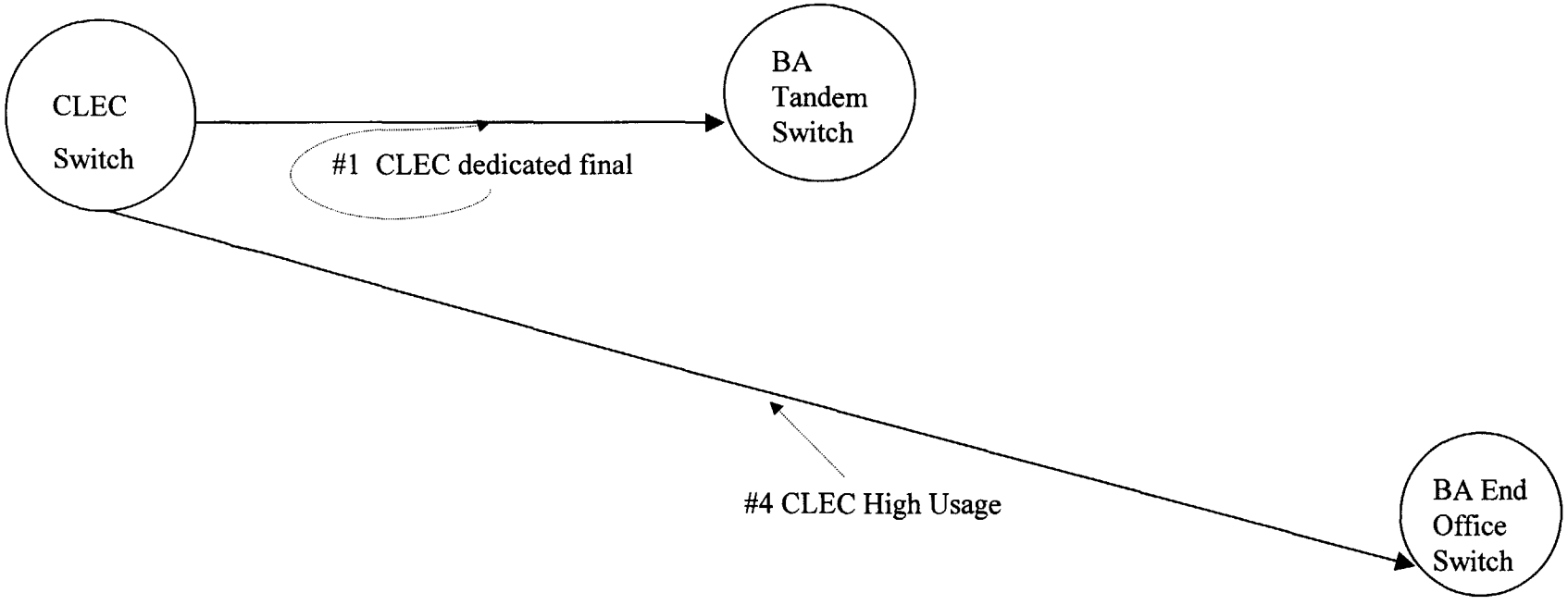
No. of Copies rec'd 0+1
List ABCDE

Interconnection Trunking

•For calls from CLECs to BA - CLECs monitor blocking, issue orders to add trunks, and issue orders to establish new trunk groups

•High usage trunk groups do not block. High usage trunk groups overflow to final trunk groups.

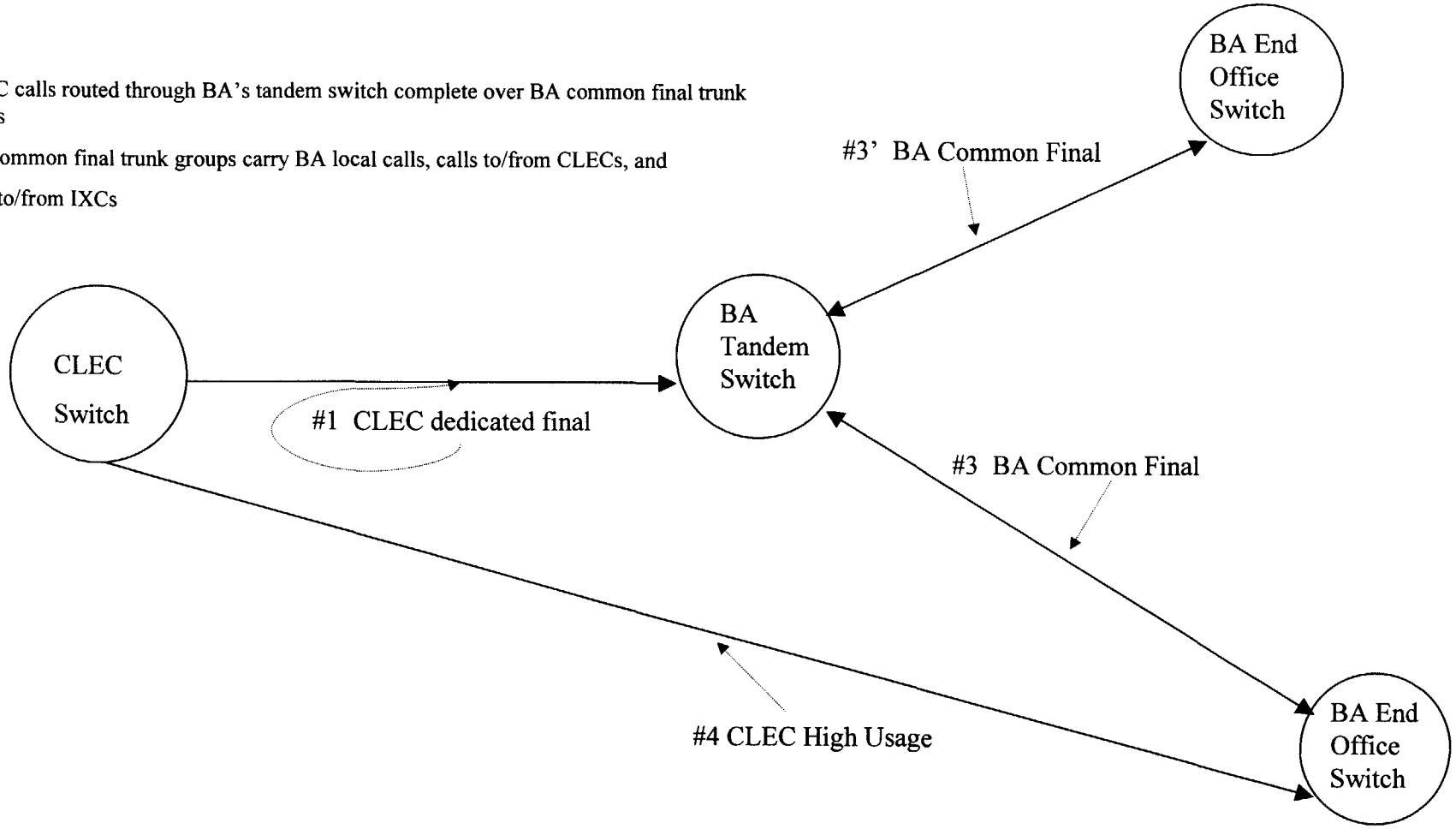
•Dedicated final trunk groups do not overflow. BA-NY dedicated final trunk groups are engineered using standard B.005 blocking tables. Based on busy hour average offered load (in a month)



Interconnection Trunking

•CLEC calls routed through BA's tandem switch complete over BA common final trunk groups

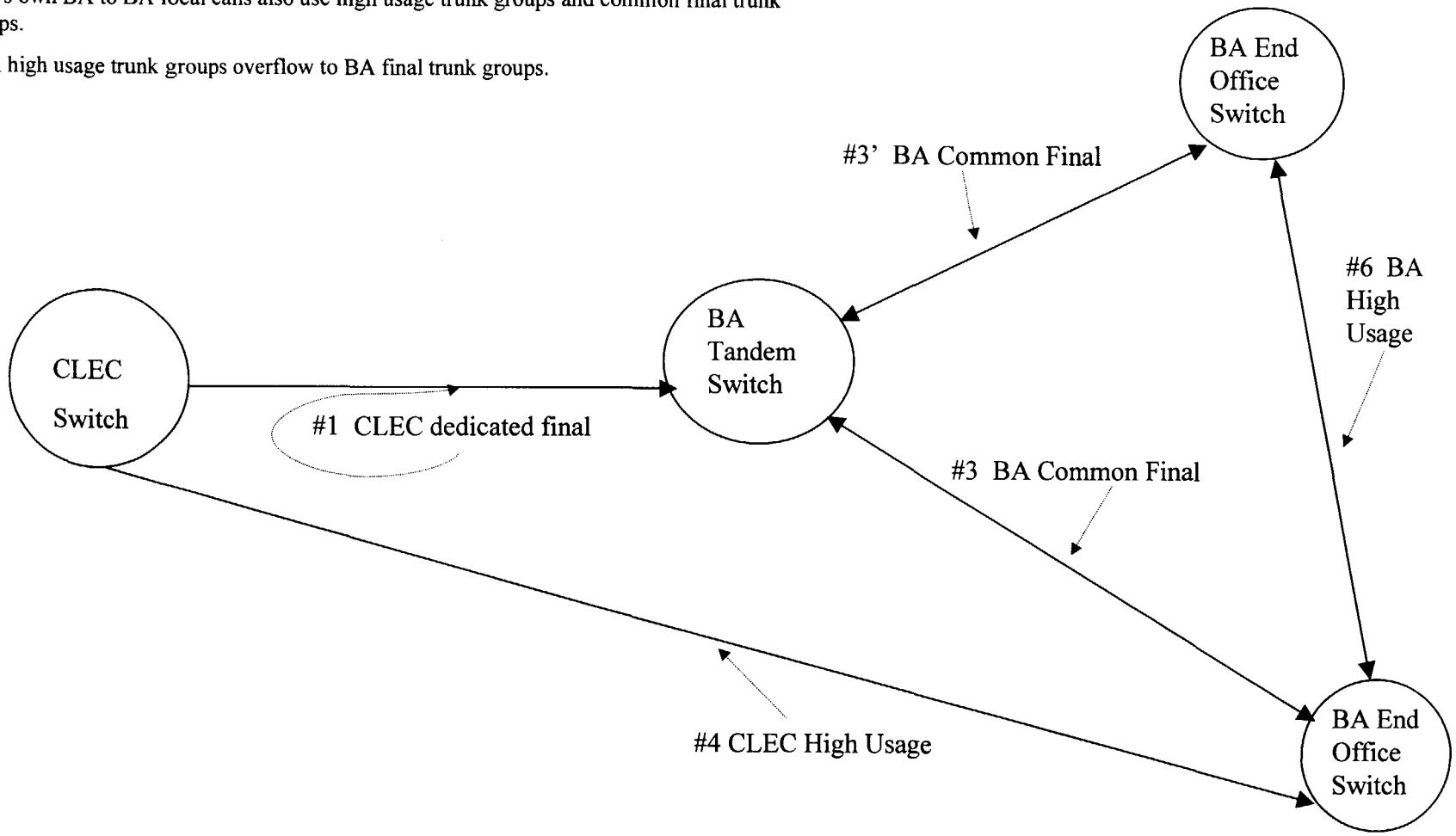
•BA common final trunk groups carry BA local calls, calls to/from CLECs, and calls to/from IXCs



Interconnection Trunking

•BA's own BA to BA local calls also use high usage trunk groups and common final trunk groups.

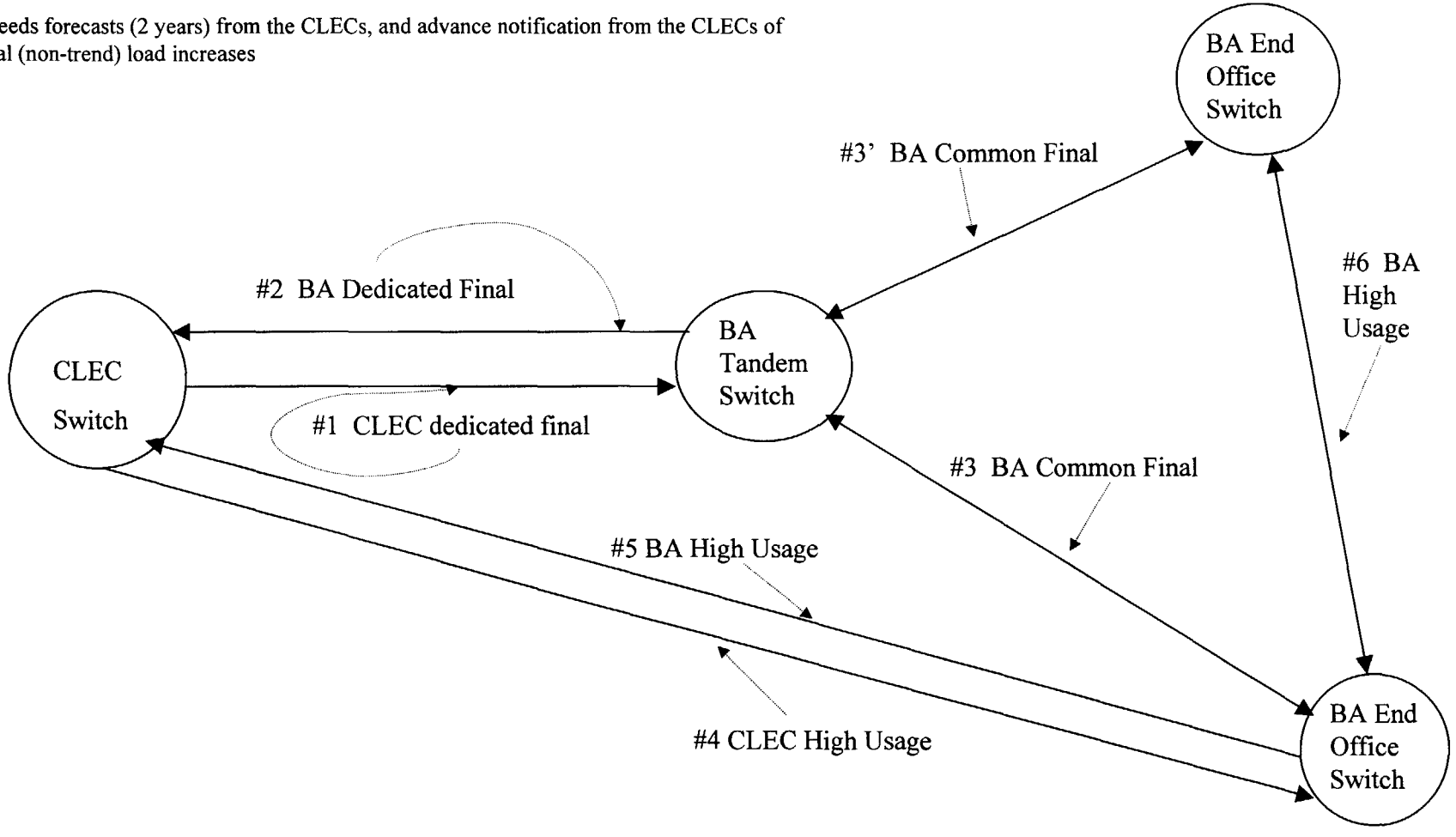
• BA high usage trunk groups overflow to BA final trunk groups.



Interconnection Trunking

•For calls from BA to CLECs - BA monitors blocking, orders additional trunks from the CLEC as needed, and establishes new trunk groups

•BA needs forecasts (2 years) from the CLECs, and advance notification from the CLECs of unusual (non-trend) load increases



Trunk Ordering and Provisioning

- Five Categories with different intervals established by NY PSC
  - Category 1: Forecasted - additions of 192 trunks or less to existing groups (18 days)
  - Category 2: Forecasted - additions of 193 to 384 trunks to existing groups (30 days)
  - Category 3: Forecasted - new groups, projects, complex, adds greater than 384 (negotiated case by case)
  - Category 4: Not Forecasted - (BA facilities are available) (45 days)
  - Category 5: Not Forecasted - (BA facilities are not available) (198 days)

Trunk Blocking

- New York Carrier to Carrier Measurements
  - Percent BA Dedicated final trunk groups exceeding engineering blocking design (informational)
  - Percent BA Common final trunk groups exceeding engineering blocking design (informational)

- Performance Standard
  - BA Dedicated final trunk groups not to exceed the engineering blocking design standard for three consecutive months

Non-Discriminatory Interconnection

- BA engineers each individual trunk group based on calls in the trunk group's busy hour
- BA engineers trunks from BA to CLECs on the same basis as it does its own trunks
- Percent BA dedicated finals exceeding design versus percent BA common finals exceeding design is not a valid comparison
- Trunk utilization is Trunks Required divided by actual Trunks in Service
- Trunks Required is calculated based on actual measured busy hour load (monthly study - 20 business days) and the same engineering blocking design as BA's network
- A valid comparison (Proof) is aggregate utilization of BA dedicated final trunks compared to aggregate utilization of BA common final trunks
  - This appropriately reflects the effects of varying sized trunk groups (small to big)
  - This appropriately reflects the effects of the amount/extent of busy hour call blocking

Interconnection Equal in Quality

- Trunks Required versus Trunks in Service (Utilization)

NEW YORK RESULTS	May	June	July	August
BA Dedicated final trunks (BA to CLEC)	54.8%	43.7%	49.8%	46.4%
BA Common final trunks	72.2%	72.8%	69.3%	71.1%

- This shows that BA-NY is currently providing a better grade of service for CLEC dedicated final trunk groups by having installed and operational significantly more interconnection trunks than what is needed to provide the designed level of blocking (B.005)
- BA-NY is servicing, engineering and providing dedicated final trunks to the CLECs better than it does final trunks within its own network.